

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)

v.)

JONATHAN MATOS and)
RAMON DIAZ)

Criminal No. 04-10237-NG)
)
)

GOVERNMENT'S EX PARTE MOTION FOR A MATERIAL WITNESS WARRANT AND
MOTION TO SEAL

The United States of America, by and through undersigned counsel, hereby requests that the Court issue a warrant of arrest for Elliot Cordero, a material witness in the upcoming trial of United States v. Jonathon Matos and Ramon Diaz, Criminal Number 04-10237-NG.

This motion is filed pursuant to the provisions of Title 18, United States Code, Section 3144, on grounds (more fully set out in the Affidavit attached hereto) that the said Elliot Cordero is a material witness in a criminal proceeding and it is impracticable to secure his attendance by subpoena.

Because the matters set forth in the accompanying affidavit address the status of the witness and his location, the public disclosure of the contents of this affidavit and this motion at this time may jeopardize the safety of the witness. Furthermore, the government does not want the witness to know of the existence of the warrant as it may make locating him more difficult.

May 17, 2006. Alfredo

Flaviana B. Boulder, USMS

Accordingly, the government requests that the Court permit that this motion and affidavit and all related materials be filed under seal and impounded until further Order of the Court.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: 

KIMBERLY P. WEST
Assistant U.S. Attorney
(617) 748-3176

Dated: May 18, 2006